

**IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

**KARLA VANESSA ARCIA, an individual,
MELANDE ANTOINE, an individual,
VEYEYO, a civic organization based in
Miami-Dade County, FLORIDA
IMMIGRANT COALITION, INC., a
Florida non-profit corporation, NATIONAL
CONGRESS FOR PUERTO RICAN
RIGHTS, a Pennsylvania non-profit
corporation, FLORIDA NEW MAJORITY,
INC., a Florida non-profit corporation, and
119SEIU UNITED HEALTHCARE
WORKERS EAST, a Labor Union,**

Plaintiffs,

v.

**KEN DETZNER, in his official capacity as
Florida Secretary of State,**

Defendant.

CASE NO. 1:12-cv-22282-WJZ

THE SECRETARY'S PRETRIAL DISCLOSURES

Defendant, Florida Secretary of State Kenneth W. Detzner ("Secretary"), pursuant to this Court's Order (ECF No. 36) and Local Rule 16.1.D, discloses the following in accordance with Federal Rule of Civil Procedure 26(a)(3):

1. The name and, if not previously provided, the address and telephone number of each witness—separately identifying those the party expects to present and those it may call if the need arises:

None. The Secretary reserves his right however, to cross-examine any witness called by Plaintiffs.

2. The designation of those witnesses whose testimony the party expects to present by deposition and, if not taken stenographically, a transcript of the pertinent parts of the deposition:

None.

3. An identification of each document or other exhibit, including summaries of other evidence—separately identifying those items the party expects to offer and those it may offer if the need arises:

None, except the Secretary reserves the right to introduce evidence to supplement or contradict any evidence introduced by Plaintiffs, if the need arises.

Respectfully submitted,

/s/ Ashley E. Davis

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Counsel for Kenneth W. Detzner

Florida Secretary of State

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing will be sent electronically to all counsel of record via the Clerk's CM/ECF system this 18th day of September, 2012.

/s/ Ashley E. Davis

Attorney